

**STATEMENT OF BASIS**  
**CITY OF WOODLAND**  
**NPDES PERMIT NO. WA0020401**

The purpose of this Statement of Basis is to explain the need to modify the Permit to remove the testing for chlorine residual and adjust the rated capacity for the City of Woodland's newly upgraded Sewage Treatment Plant.

**I. GENERAL INFORMATION**

- A. Permittee: City of Woodland  
100 Davidson Avenue  
Woodland, Washington 98674
- B. Discharge Locations: Lewis River  
Latitude: 45° 54' 04"  
Longitude: 122° 44' 10"

**II. REQUEST FOR MODIFICATION:**

Since upgrading of their wastewater plant, the plant is using ultraviolet disinfection and not chlorine. The existing permit requires that chlorine residual is to be reported on a daily basis.

Modifications made to the permit include deleting a paragraph in S1 of the permit:

Total available (residual) chlorine shall be maintained which is sufficient to attain the Fecal Coliform limits specified above. Chlorine concentrations in excess of that necessary to reliably achieve these limits shall be avoided.

Another modification made to the permit is removing chlorine from the testing schedule found in S2 of the permit.

Also, since completion of the upgraded wastewater plant, the plant design flow has increased from 0.48 MGD to 2.0 MGD.

The modification made to the permit is changing the *Effluent Limitations* in S1 of the permit from:

<u>Parameter</u>	<u>Monthly Average</u>	<u>Weekly Average</u>
Biochemical oxygen demand* (5 day)	30 mg/l, 120 lb/day	45 mg/l, 180 lb/day
Suspended solids*	30 mg/l, 120 lb/day	45 mg/l, 180 lb/day

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To:

<u>Parameter</u>	<u>Monthly Average</u>	<u>Weekly Average</u>
Biochemical oxygen demand* (5 day)	30 mg/l, 466 lb/day	45 mg/l, 700 lb/day
Suspended solids*	30 mg/l, 474 lb/day	45 mg/l, 711 lb/day

This Statement of Basis will serve as an amendment to the Fact Sheet and Permit.

*RESPONSE TO COMMENTS*

The following comment was received from the City of Woodland on November 12, 2002.

Comment:

It has occurred to us subsequent to our letter requesting this modification that it is possible the Woodland Plant may exceed the current permitted monthly average discharge of 0.48 mgd prior to the next rewrite of our NPDES. Since the plant we are just completing was designed for 2.0 mgd and since the current modification is addressing an increase in permitted average discharges of BOD and suspended solids, we are requesting consideration of an increase in the permit limits for design flow as part of this revision.

Response:

The sentence on page 2 of the permit under S1. Effluent Limitations that reads:

The monthly average quantity of effluent discharged shall not exceed 0.48 mgd.

Is now changed to:

The monthly average quantity of effluent discharged shall not exceed 2.0 mgd.